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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Sep 08, 2022

SEAN F. McAVOY, CLERK

9
10 UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF WASHINGTON
12

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 [REDACTED]
17 ANGELA MADRIGAL CHAVEZ,

18 Defendants.
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4:22-CR-6041-MKD-3
INDICTMENT

Vio.: 21 U.S.C. §§ 841(a)(1), (b)(1)(A)
(viii), 846
Conspiracy to Distribute 500
Grams or More of
Methamphetamine (Count 1)

21 U.S.C. § 841(a)(1),
(b)(1)(A)(viii)
Distribution of 50 Grams or
More of Actual (Pure)
Methamphetamine
(Count 2)

21 U.S.C. § 853
Forfeiture Allegations

24 The Grand Jury charges:

25 **COUNT 1**

26 Beginning on a date unknown, but by January 2022, and continuing until on or
27 about September 6, 2022, in the Eastern District of Washington and elsewhere, the
28 Defendants, [REDACTED]

1 [REDACTED] ANGELA MADRIGAL CHAVEZ, and other individuals, both known and
2 unknown to the Grand Jury, did knowingly and intentionally combine, conspire,
3 confederate and agree together with each other to commit the following offense:
4 distribution of 500 grams or more of a mixture or substance containing detectable
5 amount of methamphetamine, a Schedule II controlled substance, in violation of 21
6 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii), 846.

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8 COUNT 2

9 On or about February 23, 2022, in the Eastern District of Washington, the
10 Defendant, [REDACTED]

11 [REDACTED] ANGELA MADRIGAL CHAVEZ, did knowingly and intentionally distribute 50
12 grams or more of actual (pure) methamphetamine, a Schedule II controlled substance,
13 in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii).

14 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

15 The allegations contained in this Indictment are hereby realleged and
16 incorporated by reference for the purpose of alleging forfeitures.

17 Pursuant to 21 U.S.C. § 853, upon conviction of an offense(s) in violation of
18 21 U.S.C. §§ 841, as set forth in this Indictment, the Defendants [REDACTED]

19 [REDACTED] ANGELA
20 MADRIGAL CHAVEZ, shall forfeit to the United States of America, any property
21 constituting, or derived from, any proceeds obtained, directly or indirectly, as the
22 result of such offense(s) and any property used or intended to be used, in any
23 manner or part, to commit or to facilitate the commission of the offense(s).

24 If any of the property described above, as a result of any act or omission of
25 the Defendant(s):

- 26
27 a. cannot be located upon the exercise of due diligence;
28 b. has been transferred or sold to, or deposited with, a third party;
c. has been placed beyond the jurisdiction of the court;

1
2 d. has been substantially diminished in value; or

3 e. has been commingled with other property which cannot be divided
4 without difficulty,

5 the United States of America shall be entitled to forfeiture of substitute property
6 pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c).
7

8
9 DATED: this ____ day of September 2022.

10 A TRUE BILL

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12 _____
13 Foreperson

14 _____
15 Vanessa Waldref
16 United States Attorney

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18 _____
19 Stephanie Van Marter
20 Assistant United States Attorney
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